

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Criminal No: CR 15-00454 - HSG
vs.)	
)	STIPULATION TO CONTINUE
DANIEL RUSH,)	STATUS HEARING FROM
)	APRIL 25 TO MAY 2, 2016
Defendant.)	AND PROPOSED ORDER
_____)	

The Government and defendant agree, subject to the Court's approval, that the status hearing in this matter that is presently set for 2:00 PM on April 25, 2016 at the United States Courthouse in Oakland, California be continued until 2:00 PM on May 2, 2016 at the United States Courthouse in Oakland, California.

The instant request is based upon delays in preparation due to co-counsel Osterhoudt's bronchial infection over the past 2-3 weeks. Although he has now largely recovered, he must immediately complete and file a brief in the Ninth Circuit that is due this week. All of these circumstances have seriously limited co-counsel's ability to confer and to prepare for the status hearing.

Dated: April 19, 2016.

Respectfully submitted:

/s/ William L. Osterhoudt

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~~[PROPOSED]~~ ORDER

Pursuant to the foregoing stipulation, IT IS SO ORDERED, except that the motion hearing will be held on May 9, 2016, at 2:00 p.m.

Dated: April 19, 2016


HAYWOOD S. GILLIAM, JR.
United States District Judge